



STORMWATER MANAGEMENT PLAN

July 2008



SUBMIT PUBLIC COMMENT ON EUGENE'S NPDES PERMIT

SEND WRITTEN COMMENTS TO:

NPDES Permit
Eugene Public Works
410 River Ave.
Eugene, OR 97404

SEND E-MAIL TO:

Therese Walch
Water Resources Manager
therese.walch@ci.eugene.or.us

All comments must be received
by the City of Eugene by 5 p.m.
Wednesday, August 27.

*All persons who submit written
comments will be identified as interested
parties and will be notified of the City's
response to their comments if they
provide a current mailing address
or a valid email address.*

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BACKGROUND

The City of Eugene holds a federal National Pollutant Discharge Elimination System (NPDES) permit for the municipal stormwater it discharges directly into the Willamette River and indirectly into the Willamette River through other local waterways, including Amazon Creek. The



permit includes stormwater monitoring and reporting requirements, as well as a set of best management practices that define the City's Stormwater Management Plan (SWMP). The NPDES stormwater regulations do not prescribe specific limits; rather, they require permittees to implement best management practices (BMPs) to improve water quality to the "maximum extent practicable" based on local conditions, resources and priorities. The Oregon Department of Environmental Quality (DEQ) administers federal NPDES permits for municipalities and other local agencies in Oregon.

In preparation for an upcoming permit renewal the City has evaluated its SWMP to ensure that it continues to meet the objectives of the Clean Water Act and is proposing several modifications. The public is encouraged to learn more about Eugene's NPDES permit and to provide comments. Directions for obtaining additional information and providing comments are provided in this fact sheet.

Get more information about Eugene's Stormwater Permit/Program

- General and specific information about Eugene's NPDES permit and the City's stormwater program are available on the internet at www.eugene-or.gov/pw (click on the link to "Stormwater NPDES Permit")
- For specific information about Eugene's NPDES permit, call Therese Walch, Water Resources Manager, at 541-682-8647.
- For general information about Eugene's stormwater program, call Kathy Eva, Stormwater Information Specialist, at 541-682-2739.

HISTORY OF ACTIONS RELATED TO EUGENE'S STORMWATER PERMIT

Clean Water Act

The Clean Water Act of 1972 established the federal NPDES permitting program. The original purpose of the NPDES program was to control and eliminate pollutants from single identifiable sources, sometimes called point sources. The Clean Water Act was reauthorized by Congress in 1987. The reauthorized law was expanded to include non-point source pollution: overland runoff containing pollutants which do not originate from one specific location. The expanded law required municipalities over 100,000 in population to obtain NPDES permits for their stormwater discharges.

CSWMP and Eugene's First Permit Term

In response to the 1987 reauthorization of the Clean Water Act, the City Council adopted a Comprehensive Stormwater

Management Plan (CSWMP) in 1993. Key elements of this policy document include:

- A multiple-objective approach to stormwater management that addresses drainage, water quality, and stormwater-related natural resources.
- A set of policies, goals and implementation actions to guide the City's stormwater program.
- Two types of implementation actions – best management practices (BMPs) to specifically comply with NPDES permit requirements, and "other actions" consistent with community expectations for stormwater management. Eugene's first NPDES permit was issued by the DEQ in 1994.

Eugene's Second Permit Term (current)

In March 2004, the DEQ issued a new NPDES permit to Eugene. In response to the new permit, in 2005 the City revised its SWMP in several significant

ways including: to prioritize the adoption of stormwater development standards; to establish a consistent policy on the public use of herbicides and fertilizers, and to increase efforts to address specific pollutants of concern for Eugene's waterways, especially 303(d)-listed water bodies (see glossary). The revised SWMP anticipated that pollutant allocations would be established for certain watersheds within Eugene as Total Maximum Daily Load (TMDL) requirements.

Preparing for Permit Renewal

Eugene's current NPDES permit is scheduled to expire on February 28, 2009; a renewal application will be submitted to DEQ on September 2, 2008. In response to specific permit renewal requirements and routine adaptive management, the City has evaluated its SWMP, and is proposing several additional revisions, described generally below.

RESULTS OF THE NPDES PERMIT-RELATED EVALUATION

City of Eugene staff conducted a review of Eugene's existing Stormwater Management Plan (SWMP), including existing best management practices (BMPs). In evaluating the plan, staff considered a variety of factors, including: specific federal statutes governing SWMP components; overall program effectiveness; how the program addresses specific stormwater pollutants of concern; local applicability of BMPs; and program resources. The results of this evaluation will be the basis for the permit renewal application to DEQ and the proposed revised SWMP.

One outcome of the evaluation was the validation of existing program activities considered essential to meeting permit conditions: These include:

- Stormwater system operations and maintenance (O&M)
- Stormwater education
- Erosion prevention
- Stormwater development standards
- Illicit discharge detection and spill response
- System retrofit projects for water quality
- Industrial stormwater program.

Proposed changes to the SWMP include:

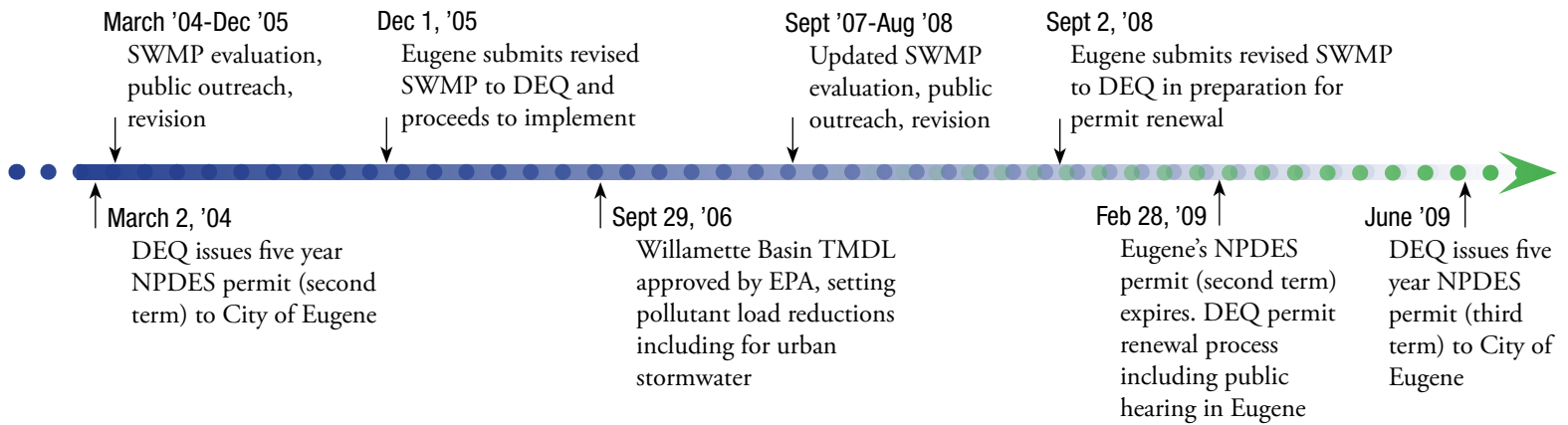
- Two new BMPs to reflect the City's commitment to ensuring that new privately maintained stormwater facilities continue to function properly over the long-term.
- Modifications to reflect the transition from long-term planning to implementing capital projects, including retrofits to the existing stormwater system to address water quality.
- Modifications to reflect on-going efforts to identify barriers to implementing low impact development.
- Modifications to the Bacteria Pilot Study initiated in 2006, based upon initial monitoring to determine potential sources of bacteria in Eugene's waterways.
- Modifications to combine two education-related BMPs into one overall stormwater education BMP.
- Modifications to incorporate the periodic review and revision of O&M manuals into the O&M BMPs as adaptive management.
- One new BMP to reflect permit management activities including program review, renewal applications, and reporting.

The proposed 2009 SWMP is a set of 24 BMPs that meets the permit renewal requirements of the current NPDES permit and reduces the discharge of pollutants to the maximum extent practicable.

For more specific information on the proposed SWMP modifications, and to review the draft SMWP, see "Get More Information" on page 1 of this fact sheet.



TIMELINE *program implementation and adaptive management*



SUMMARY OF EUGENE'S STORMWATER BEST MANAGEMENT PRACTICES

Eugene's SWMP is comprised of 24 best management practices (BMPs) which fall into the eight general categories listed below. For each category, the general purpose of the category is provided, followed by a brief description of each BMP within the category. Detailed information on each BMP can be found on the internet at www.eugene-or.gov/pw (click on the link to "Stormwater NPDES Permit").

PUBLIC EDUCATION

The purpose of public education BMPs is to inform the public, the commercial/industrial sector, and in-house personnel about the sources and causes of stormwater pollution, its effect on the local receiving waters, and to encourage active involvement (e.g. behavioral changes, volunteerism, etc.) in the effort to reduce pollution.

A1 – Stormwater Education

P1 – Educational Volunteer Program

OPERATIONS AND MAINTENANCE

The purpose of operations and maintenance BMPs is to maintain the publicly managed stormwater system (e.g. pipes, culverts, open waterways, water quality facilities), balancing flood control, drainage services, water quality, and natural resource protection needs, and to adaptively manage for continuous improvement of current operations and maintenance practices.

Operations and maintenance BMPs are also focused on planning and performing other City services, such as landscape maintenance or road repair projects for example, in a manner that minimizes the potential for stormwater pollution from these activities.

M3 – Street Sweeping and Leaf Pick-up

M4 – Prevent Leaks and Spills from Municipal Vehicles and Equipment

M5 – Public Stormwater System Maintenance–Piped System



M8 – Winter Road Sanding and De-Icing Program

P3 – Tree Planting and Information Programs

P4 – Public Landscape and Vegetation Management Program

P5 – Public Stormwater System Maintenance–Open Waterways

ILLICIT DISCHARGE CONTROLS

The purpose of illicit discharge BMPs is to become aware of, investigate, detect, mitigate, and enforce the elimination of illicit (non-stormwater) discharges and illegal dumping to the stormwater system.

M1 – Enforcement of Illicit Discharges to the Stormwater System

M2 – Spill Response

M7 – Systematic Field Investigation of System Condition and Improper Discharges

P7 – Litter and Illegal Dumping Control

Eugene's SWMP includes 24 best management practices (BMPs) designed to collectively reduce the discharge of stormwater pollutants to the maximum extent practicable. Each BMP is given an ID (for example, A1) for tracking and reporting purposes; the coding is based on the City work section with lead responsibility, as follows:

A – Administration Division of Public Works

B – Building Division of Planning and Development

E – Engineering Division of Public Works

M – Maintenance Division of Public Works

P – Parks and Open Space Division of Public Works

W – Wastewater Division of Public Works

WASTE MANAGEMENT

The purpose of the waste management BMPs is to educate the public, regulate waste management services, and ensure that proper facilities are available in order to minimize the potential of negative stormwater impacts from solid waste collection, improper disposal of toxic materials, and illegal dumping of garbage and debris.

B1 – Household Hazardous Waste Program

B2 – Solid Waste Management

CONSTRUCTION AND NEW DEVELOPMENT

The purpose of the construction and new development BMPs is to ensure that appropriate control measures are considered, implemented, and maintained during and after the planning, design and construction phases for new public and private development and significant redevelopment projects.

E2 – Erosion Prevention and Construction Site Management Program



E4 – Stormwater Development Standards

M6 – Regulation of Inspection, Maintenance, and Reporting of Private Underground Stormwater Structures*

P6 – Compliance Program for Maintenance of Privately Owned Vegetated Stormwater Facilities*

PLANNING, CAPITAL IMPROVEMENTS, AND DATA MANAGEMENT

The purpose of planning, capital improvements, and data management is to develop and implement comprehensive stormwater basin plans, evaluate potential sources of specific pollutants and related BMPs to address them and maintain up-to-date data on the stormwater system.

E1 – Stormwater Capital Improvement Projects

E3 – Storm System Mapping and Data Management

P2 – Bacteria Pilot Study

INDUSTRIAL CONTROLS

The purpose of the industrial control BMP is to provide oversight of stormwater discharges from industrial facilities, including screening, inspections, technical assistance, and response to spills at permitted facilities.

W2 – Industrial Stormwater Management Program

PERMIT MANAGEMENT

The purpose of permit management is to ensure effective permit management, coordination, and reporting.

W1 – Permit Management and Reporting*

** New BMPs proposed for 2008 SWMP*

GLOSSARY

303(d) listed water body – A water body that DEQ has determined does not meet state water quality standards for specific pollutants.

BMP – Best management practice, a practice or combination of practices that prevents or reduces storm water runoff and/or associated pollutants

CSWMP – Comprehensive Stormwater Management Plan, Eugene's adopted policy document which provides the framework for the integration of flood control and drainage

services, water quality protection, and the protection of stormwater-related natural resources.

DEQ – Oregon Department of Environmental Quality, which is responsible for administering the NPDES program for cities, counties and other governmental entities in Oregon.

EPA – U.S. Environmental Protection Agency, which is responsible for administering the NPDES program for the federal government.

MS4 – Municipal separate storm sewer system, a system of conveyances including roads with drainage systems, catch basins, gutters, ditches, manmade channels, storm drains or other facilities used to collect and convey stormwater.

Phase I permittee – Agencies with populations over 100,000 required to obtain stormwater NPDES permits in the mid-1990s.

Phase II permittee – Smaller jurisdictions now required to obtain NPDES permits. In this area, phase II permittees include the City of Springfield and Lane County.

SWMP – Stormwater Management Plan, a set of best management practices that reflects Eugene's commitment under its NPDES permit to reduce pollutants to the maximum extent practicable.

TMDL – Total maximum daily load, the wasteload allocation for a specific pollutant, typically expressed as parts per volume.